

Serial Number 10/749,566

REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Claims

Claims 1 and 6 have been amended to clarify that:

- the at least one resilient contact member is mounted at a first lateral side of the receiving space;
- the lateral biasing member is mounted at a second lateral side of the receiving space;
- the lateral biasing member engages a lateral edge of a memory card and pushes the memory card toward the at least one resilient contact member to ensure that the at least one resilient contact member is able to engage a write-protect contact on an opposite edge of the memory card upon complete insertion of the memory card into the receiving space.

In other words, independent claims 1 and 6 have been amended to clarify that the lateral biasing member engages one side of the memory card to push the other side against the write-protect contact. This is clearly described in connection with Figs. 3, 4, 7, and 8 on pages 4 and 5 of the original specification, and therefore does not involve "new matter."

2. Rejection of Claims 1, 4, 5, and 6 Under 35 USC §103(a) in view of U.S. Patent Nos. 6,247,947 (Knoernschild) and 6,129,588 (Chang)

This rejection is respectfully traversed on the grounds that neither the Knoernschild patent nor the Chang patent, whether considered individually or in any reasonable combination, discloses a lateral biasing member that engages a lateral edge of a memory card so as to push on the memory card and cause another lateral edge to engage a write-protect contact, as claimed.

While the Knoernschild patent discloses a member on a side of the receiving space that corresponds to the claimed "second side" (as indicated in the attachment to the Official Action,

Serial Number 10/749,566

showing Fig. 7 of the Knoernschild patent), the Knoernschild patent does not disclose that the member is a *biasing* member that pushes on a memory card to cause the memory card to engage a write-protect contact at a "first side" of the card receiving space.

To the contrary, as is clear from Figs. 5 and 6 of the Knoernschild patent, the un-numbered lateral member is intended to extend into a notch in the memory card to *hold the memory card in the inserted position*, and has no lateral biasing effect. When the memory card is completely inserted, the projection at the end of the lateral member will extend into a notch on the side of the memory card (near the left-side DAT2 contact shown in Fig. 6 of Knoernschild) and therefore not push the memory card in a lateral direction. As a result, if a memory card having a smaller than standard size is inserted into reader of Knoernschild, the write-protect contact 18 will not be properly read, which could result in unintended erasure of data.

This deficiency is not made up for by the Chang patent, which does not disclose any sort of lateral member, much less a lateral *biasing* member of the type claimed. Because neither reference discloses or suggests the claimed lateral *biasing* member, withdrawal of the rejection of claims 1 and 4-6 under 35 USC §103(a) is respectfully requested.

3. Rejection of Claim 2 Under 35 USC §103(a) in view of U.S. Patent Nos. 6,247,947 (Knoernschild), 6,129,588 (Chang), and 6,478,593 (Hu)

This rejection is respectfully traversed on the grounds that the Hu patent, like the Knoernschild and Chang patents, fails to disclose or suggest a lateral biasing member that engages a lateral edge of a memory card so as to push on the memory card and cause another lateral edge to engage a write-protect contact, as claimed. Instead, the Hu patent discloses spring tabs 50 which are "adapted for engaging with a locking notch (108) of an inserted card (102). Spring tabs 50 of Hu are identical in function to the un-number side member of Knoernschild, discussed above, and do not serve to push the memory card against a write-protect contact. In

PAGE 717 * RCVD AT 12/27/2004 4:03:47 PM [Eastern Standard Time] * SVR:USPTO-EFXXRF-1/1 * DNIS:8729306 * CSID:703 683 0884 * DURATION (mm:ss):02:26